

Crystal L. Cox
Pro Se Defendant
Case 2:12-cv-02040-GMN-PAL
SavvyBroker@Yahoo.com

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Case 2:12-cv-02040-GMN-PAL

Plaintiff, Counter Defendant Marc J. Randazza /

Reply to PLAINTIFFS' OPPOSITION TO
DEFENDANT COX'S MOTION TO
PROCEED IN FORMA PAUPERIS

v.

Defendant Crystal Cox and Defendant Eliot Bernstein

Counter Defendants, As Follows:

Marc Randazza, personally and professionally,

Ronald D. Green, personally and professionally,

Randazza Legal Group,

Greenberg Traurig Law Firm,

Kenneth P. White, personally and professionally,

Brown, White and Newhouse Law Firm,

Kashmir Hill of Forbes, personally and professionally,

Forbes Inc., .

Godaddy Inc.,

Bob Parsons, Jessica Griffin, personally and professionally

Tonkon Torp Law Firm,

David S. Aman, Michael Morgan, Steven Wilker, personally and professionally,

Proskauer Rose Law Firm,

Kenneth Rubenstein, Allen Fagin, Gregg (Greggory) Mashberg, Jenifer DeWolf Paine, Joseph Lecesce, personally and professionally,

Obsidian Finance Group,

David W. Brown, Kevin D. Padrick, personally and professionally,

WIPO,

Francis Gurry, Erik Wilbers, personally and professionally,

Peter L. Michaelson, personally and professionally,

New York Times, David Carr,

Philly Law Blog, Philadelphia Business,

Jordan Rushie, personally and professionally, P

Leo M. Mulvihill, Jr., personally and professionally,

Mulvihill & Rushie, LLC,

SaltyDroid, Jason Jones Esq., personally and professionally

Janine Robben personally and professionally

Oregon State Bar Bulletin

John C. Malone, personally and professionally

Corbin Fisher, Business, Corporation,

XBIZ, California Business

Manwin, Business, Corporation, LUXEMBOURG, Montreal Canada, Los Angeles

Bob Garfield, personally and professionally

NPR, New York Public Radio,

Tracy L. Coenen personally and professionally

SequenceInc.com, Wisconsin Company

Mark Bennett, personally and professionally

blog.bennettandbennett.com, Bennett and Bennett, Business

Scott H. Greenfield, Carlos Miller, John Calkins Sony, personally and professionally,

Eric Turkewitz, personally and professionally

Matthew M. Triggs, Personally and Professionally

Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com,

Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog and
blog.simplejustice.us, personally and professionally

Carlos Miller of PixIQ.com and PhotographyisNotaCrime.com, personally and professionally

Roxanne Grinage, personally and professionally, HireLyrics,

Sean Boushie, personally and professionally,

University of Montana, Montana

Royce Engstrom, Bernie Cassidy, Taylor Kai Groenke (Kai Groenke), personally and
professionally,

Martin Cain, Dylan Energy, personally and professionally, Maryland Individual, Maryland Business

APPLE, Corporation

Steve Dowling, Bruce Sewell, California, Doug Chey, Douglas D. Chey, personally and professionally California

Tim Vawter, The Protection Group Video, personally and professionally

Judge Gloria M. Navarro personally and Professionally,

Daniel Staton Professional and Personally,

Marshall Ross Professional and Personally,

Multnomah County Sheriff's Office

Intel Corp. Oregon Business, California Business, Global Business

Steven Rodgers Vice President & Deputy General Counsel at Intel Corporation, Personally and Professionally.

Mark Vena, personally and professionally,

David Wang, personally and professionally,

Synaptics,

Bret Sewell, personally and professionally,

EDWARD KWAKWA, personally and professionally,

P. Stephen Lamont, personally and professionally,

Ari Bass - Michael Whiteacre, personally and professionally,

Sean Tompkins, personally and professionally,

Leo M. Mulvihill, Jr. Personally and Professionally,

Mulvihill & Rushie LLC,

Free Speech Coalition,

Diana Duke, Personally and Professionally,

Liberty Media Holdings, and All Liberty Media Holdings Companies as Follows:

Liberty Media Holdings Connected Companies: Liberty Capital, AOL Inc. (1% through Liberty Capital and 2% through Liberty Interactive), Barnes and Noble Inc. (17%), CenturyLink Inc. (1%) Crown Media Holdings Inc. (3%), Current Communications Group LLC. (8% through Liberty Partners and Liberty Associated Partners), Jingle Networks Inc. (9% through Liberty Partners and Liberty Associated Partners), Kroenke Arena Company LLC. (7%), Live Nation Entertainment Inc. (21%), Mobile Streams Inc. (16%), Motorola Mobility Inc. (2%) Motorola Solutions Inc. (2%), Priceline.com Inc. (1%), Sirius XM Radio Inc. (40%) Sprint Nextel Corporation (2%), Time Warner Cable Inc. (1% through Liberty Capital and 2% through Liberty Interactive), Time Warner Inc. (1% through Liberty Capital and 2% through Liberty Interactive), Viacom Inc. (1%)

Note To Court: This Court has DENIED requests to sign a conflict of Interest Disclosure, though requested several times by Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox. Any action forward by Judge Gloria M. Navarro or Judge Peggy A. Leen, who refuses to admit/deny conflicts and rules forward will be charged with Obstruction of Justice through conflicts of interest, violations of attorney and judicial cannons in order to Deny Due Process via aiding and abetting the alleged civil and criminal conspiracy through Fraud on the Court.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox intend to file criminal complaints against any officer of the court, including opposing counsel, who violates any law or ethical statues in order to perpetrate the fraud through obstruction via conflicts, or has violated any law already in previous rulings affecting me, Pro Se Defendant, Pro Se Counter Defendant Crystal Cox.

Therefore every ruling of this court on a motion without conflict disclosure will be charged for each and every act a in a criminal complaint, forthcoming.

Judge Gloria Navarro is alleged by Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox to be acting in criminal and civil conspiracy with Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants of District of Nevada Case 2:12-cv-02040-GMN-PAL and therefore this court has a duty to notify all applicable authorities, bond carriers, insurance carriers, AND State and Federal Auditors of the liability of this allegation in a Federal Court Proceeding.

Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green has repeatedly attempted to BLOCK due process of law and to Ignore the Constitutional Rights of Both Defendant Eliot Bernstein and Counter Plaintiff / Defendant Crystal Cox.

Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green files a Lawsuit against me, does not serve me, defames me over the lawsuit he filed in blogs and then accuses me of using my Complaint Answer and Counter Complaint as a way to “further” defame him, them. Yet they claim their case is about Trademark and Copyright and not Defamation. When clearly they have violated my First Amendment Rights repeatedly, in total disregard of the Law and the U.S. Constitution.

Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green Stole massive blogs and domain names from me and caused irreparable damage, before adjudicating the First Amendment implications of the issue at hand.

I, Crystal L. Cox, am a Media Defendant who is reporting on Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green and Marc Randazza negotiated on my behalf, acting as my attorney, at one time, and tried to run off other First Amendment Bar attorneys from representing me, in my Ninth Circuit Appeal of Obsidian Finance Group v. Crystal L. Cox.

Plaintiff / Counter Defendant Marc J. Randazza defended a man owning the domain name GlenBeckRapedandMurderedAYoungGirlin1990.com and said it was NOT a trademark violation, yet Plaintiff / Counter Defendant Marc J. Randazza SEIZES FuckMarcRandazza.com, MarcRandazzaParody.com, RandazzaLegalGROUPSucks.com, MarcRandazzaSucks.com and many more domain names that he does not approve of, and claims they are as Trademark violation.

Counter Defendant Ronald Green flat out LIES, and commits fraud on this court saying “Defendant Bernstein’s use of MARC RANDAZZA in connection with his websites is likely to cause confusion as to the source and origin of Defendant’s services”

Upon Belief and Knowledge, There is absolutely no way that a reasonable reader or a neutral Jury would ever see MarcRandazzSucks.com, FuckMarcRandazza.com, HypocriteMarcRandazza.com, TrollMarcRandazza.com, MarcRandazzaisALyingAsshole.com, as a “confusing” or similar tradename. There is no way that those domain names would cause confusion as to the source and origin of the Services, Counter Defendant Ronald Green said that in a Default Judgement document to get Judge Gloria Navarro to grant him \$23,000 in LEGAL Fees and get his “Client”, his boss, Plaintiff Attorney Marc Randazza \$500,000.

This is a Fraud on the Courts, an Obstruction of Justice and a Violation of OUR Constitutional Rights. These attorneys SHOULD lose their license and a Summary Judgement should be IMMEDIATELY granted to Defendant / Counter Plaintiff Crystal Cox.

Defendant Eliot Bernstein has NO Website Connected to the domain names in which Counter Defendant Ronald Green and Counter Defendant / Plaintiff Attorney Marc Randazza STOLE. Defendant Crystal Cox has blogs that were pointed to those domain names. And there is no way what so ever that there is "likely to cause confusion as to the source and origin" of "services" in regard to these and other domain names in connection with this case:

MarcRandazzSucks.com, FuckMarcRandazza.com, HypocriteMarcRandazza.com, TrollMarcRandazza.com, MarcRandazzaisALyingAsshole.com. There is a Clear, NON-Confusing Objective on those Domain Names in which no reasonable reader could EVER miss. And it has nothing to do with a confusing mark or confusing services.

Upon Belief and Knowledge of Pro Se Crystal Cox, Counter Defendant Ronald Green and Counter Defendant / Plaintiff Attorney Marc Randazza are involved in a scheme, a racket, an abuse of power, a fraud on the courts, as it is Clear, Obvious and Blatant that Defendant Crystal Cox HATES Marc Randazza and his corrupt, evil ways, therefore she is very vocal about this HATE, and her personal experience with Plaintiff Marc Randazza and his Co-Conspirators. And Defendant / Counter Plaintiff Crystal Cox also posts tips she gets from Industry Insiders, Sources, Whistle Blowers as she is MEDIA. There is no Trademark or "Mark" Violation and NO Reader would assume that I am trying to lure them in to sell a similar, commercial product or service. It is Obvious, Blatant and not Confusingly Similar in ANY way.

In the Florida Appellate Case No. 3D12-3189, Marc J. Randazza fights for his own client against Preliminary Injunctions.

Upon Belief and Knowledge Plaintiff / Counter Defendant Marc J. Randazza claims that it's a violation of first amendment rights, and that the First Amendment must be adjudication first, yet he does just the opposite in this case to seek Revenge on a Former Client, to Suppress My Online Free Press Blogs, and to Retaliate Against Whistle Blowers Exposing his connections to Prostitution Rings and to the fact that his clients are infringing on the iViewit Video Technology.

Injunctive relief to prevent actual or threatened damage is heavily disfavored because it interferes with the First Amendment and amounts to censorship prior to a judicial determination of the lawlessness of speech. See *Moore v. City Dry Cleaners & Laundry*, 41 So. 2d 865, 872 (Fla. 1949). "The special vice of prior restraint," the Supreme Court held, "is that communication will be suppressed... before an adequate determination that it is unprotected by the First Amendment". *Pittsburgh Press Co v. Pittsburg Comm'n on Human Relations*, 413 U.S. 376, 390 (1973). Also see *Fort Wayn Books Inc. v Indiana*, 489 U.S. 46, 66 (1989); *M.I.C., Ltd v Bedford Township*, 463 U.S. 1341, 11343 (1983.)

In this case, the Nevada Court has skipped the step of adjudicating the First Amendment protection relevant to the speech at issue. Prior Restraints are Unconstitutional.

Also see Post-Newsweek Stations Orlando, Inc. v. Guetzlo.

“RKA sought extraordinary relief in the form of prior restraint to enjoin . . . This relief is not recognized in this State, nor anywhere else in the Country. In addition to ignoring the First Amendment Rights and almost a century’s worth of common law, the . . . court ignored virtually all procedural requirements for the issue of a preliminary injunction.” Page 5 Paragraph ii of Opening Brief Appellate Case No. 3D12-3189, Irina Chevaldina Appellant vs. R.K./FI Management Inc.;et.al., Appellees. Attorney for Appellant Marc J. Randazza Florida Bar No. 325566, **Randazza Legal Group Miami Florida. This case is now hereby referenced here in, in it’s entirety.**

Clearly Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green are involved with Counter Defendants / Co-Conspirators to retaliate against whistle blowers, and to Suppress Information Online in which exposes their illegal prostitution rings, and their clients infringing on a 13 Trillion Dollar Video Technology. And that they are not operating in a matter of law and justice seeking.

Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green try and make my counter complaint look like a “fantasy” of my mind, when there are over 1200 documents of proof of the iViewit Technology theft and the involvement of the Counter Defendants and Co-Conspirators, who they, themselves brought iViewit Technology Founder and one of the iViewit Technology Inventors into this case to attempt to Silence Him.

If not unlawful, then certainly it is unethical for Marc Randazza, and Attorney, to have his Attorney in this matter be one from his own law firm, Randazza Legal Group. Especially, when the record clearly shows that Marc Randazza Randazza Legal Group attempted to negotiate acting as my attorney, on my alleged behalf, and there are First Amendment Bar witnesses to attest to this.

State of Nevada Case 2:12-cv-02040-GMN-PAL lawsuit was initiated specifically for the purpose of creating a chilling effect and is a Strategic Lawsuit Against Public Participation, or "SLAPP" suit.

State of Nevada Case 2:12-cv-02040-GMN-PAL is a harassing, intimidating, rights violating fraud on the courts. This court should make Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants an example that the courts do not allow / do not tolerate Attorneys to frivolously sue poor defendants in order to steal their rights and intellectual property and to take away their constitutional rights, free speech rights, freedom of expression rights, just because they have more power and court connections.

Upon Belief and Knowledge of Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants have committed fraud on this court and has harassed a federal defendant who was once a client of the Plaintiff Marc J. Randazza.

I am CLEARLY not capable of paying the costs of my Counterclaim.

Domain Names are \$10 a year, I don't have that many, and yes I buy them, as part of my ongoing business endeavors, and online media network. Check the Godaddy records, I do not spend much on domain names. I have lost most all in receivership.

I have a 2.5 Million Judgment filed in Jefferson County, Washington. As Exhibit A, B, C, and D show clearly.

My, over a thousand blogs are Google Blogs and are Free, they are .blogspot, which are **Free Google Blogs**. I put in massive amounts of time building these blogs to maintain my business.

Plaintiff / Counter Defendant Marc J. Randazza, has company Letterhead for his Law Firm, found online that claims him and his company to be Domain Name Experts, Intellectual Property Experts, as does Plaintiff's Attorney Ronald D. Green, yet they, deliberately, with actual malice Paint me in false light and use this court docket AGAIN to defame me and make me look bad.

They know full well that Google blogs are Free, and that my \$10 domain names are hardly any money. In fact I don't smoke nor drink, nor any other form of recreation really, and \$10 here and there for a Domain Name is not much cost at all, Plaintiff's fraudulently lie to this court.

This court should sanction Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green for yet again deliberately lying about Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox in effort to further deny my rights to due process, defame me, harass me and paint me in false light.

Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green as well as other co-conspirators have defamed me to the point online where new income is impossible. They have stated on their falsified "Legal Commentary" Blogs that I am guilty of Extortion, and posted it in public domain decisions, when I was not on trial for Extortion, nor convicted of Extortion, nor was I under investigation for Extortion. They have put me to financial ruin, with no hope of future business. They did this with actual knowledge they were posting false information.

Counter Defendants and Co-Conspirators of District of Nevada Case 2:12-cv-02040-GMN-PAL published defamatory statements with 'actual malice,' against Counter Plaintiff Crystal Cox, meaning they had knowledge that the statements they were posting were false and they went ahead with reckless disregard of whether they were false or not and posted these defamatory false statement. *Times v. Sullivan*, Nov. 30 Op. at 5, 1 ER 39.

Counter Plaintiff Crystal Cox cannot recover damages without proof that Counter Defendant was negligent and Counter Plaintiff Crystal Cox may not recover presumed damages absent of proof of actual malice as in *Gertz*, 418 U.S. at 347." *Id.* at 9, 1 ER 43. However, Clearly in District of Nevada Case 2:12-cv-02040-GMN-PAL Counter Defendants had actual malice, they posted FALSE STATEMENTS knowing the information was false, and therefore cannot a defense in *Gertz*, and *Times V. Sullivan* as a reason, a defense to have defamed me, Counter Plaintiff Crystal Cox, Deliberately and with Actual Malice.

There is clear, blatant and OBVIOUS proof that Counter Defendants were seriously, deliberately, negligent, and had blatant, boldly lit, obvious, ACTUAL MALICE. This court should grant Counter Plaintiff Crystal Cox a Summary Judgement on this matter.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox object to Plaintiff / Counter Defendant Stating that I have dozens of unrelated Counter Defendants. I am working on, yet another Amended Complaint to better show this court how they are all related in Criminal and Civil Conspiracy against me and against Defendant Eliot Bernstein. They are certainly connected in criminal and civil conspiracy to the best of my belief and knowledge.

Marc J. Randazza and Attorney Counter Defendant Ronald D. Green BULLY Defendant / Counter Crystal Cox further by this Flat out Falsehood, with Deliberate Intention to Harm me, these attorneys SHOULD know better than this statement, "Ironically, that judgment arises from *Obsidian Finance Group LLC v. Cox*, Case No. 3:11-cv-57 (D. Ore. 2011), where she was held liable for the same exact conduct underlying this lawsuit. The only substantive difference between that case and this one is that the Obsidian plaintiffs sued for defamation, while Plaintiffs in this action pursue trademark, cyberpiracy, and right of publicity actions. Cox's efforts in the Oregon court, including posting a Rule 62 supersedeas bond, have prevented the Obsidian plaintiffs from executing their judgment pending Cox's appeal – ensuring that the \$2.5 million judgment has no effect on her finances. Case No. 3:11-cv-57 (ECF 142, 152, 153) (D. Ore. 2012-2013)."

Which again is a Fraudulent Statement, Fraud on this Court and Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green **should be sanctioned**. Obsidian V. Cox was a Defamation Lawsuit, the Courts plainly erred in stripping me of my lawful constitutional rights, as my Appeal Documents Clearly Show. Also, Note here, that Marc J. Randazza Plaintiff, negotiated with David S. Aman, attorney for Plaintiff / Opposing Counsel Obsidian Finance Group, as a way to STOP my Ninth Circuit Appeal, this before I went with Attorney Eugene Volokh instead. Marc J. Randazza Plaintiff defended me on this very matter he is, here now slamming me for, and deliberately distorting the facts.

Secondly, Plaintiff / Counter Defendant Marc J. Randazza and Attorney Counter Defendant Ronald D. Green are claiming this is a Trademark Infringement Lawsuit, however this case is clearly about them accusing me of defamation and stealing my domain names, deleting blogs in which I criticize them on, and with out adjudication of my First Amendment Rights. Marc Randazza has NO Trademark on the name Marc Randazza. Plaintiff has no right to domain names such as MarcRandazzaSucks.com, FuckMarcRandazza.com, MarcRandazzaParody.com and others. They are clearly gribe sites, and not a Trademark infringement

In WIPO Decision Case No. D2012-1525, Counter-Defendant Peter L. Michaelson discusses Counter-Defendant Marc Randazza's given name and "Mark". Yet no Trademark Documents applied or were filed. And Counter-Defendant Marc Randazza goes by MarcoRandazza on Twitter, YouTube and his username on his own blog.

There is no ™ on Marc Randazza's Blog. And there was no proof given to WIPO of Marc Randazza's "given name" as I believe his birth name is Marco Randazza and not Marc Randazza. Also note that this Marc Randazza is not the only Marc Randazza in the world and should not have a right to steal this intellectual property as the only rightful owner in the world.

On belief and knowledge of Defendant Crystal Cox, Plaintiff Marc Randazza has Criminally and Civilly Conspired with INTA, Peter L. Michaelson, WIPO and John and Jane Does Regarding the name "Marc Randazza and Fraudulent Trademark Claims.

Regarding Trademark issues, Defendant, Attorney Marc Randazza uses Marco Randazza as his Twitter and YouTube User Name, as well as his username on his own blog. As Seen In Exhibit Q. Defendant, Attorney Marc Randazza had no ™ posted at his blog regarding the name Marc Randazza as beign trademarked and Plainiff Attorney Marc Randazza had no Trademark when purchased Defendant Crystal Cox purchased MarcRandazza.com to use as PR for Defendant Crystal Cox's highly public First Amendment Case.

Marc Randazza has no common law trademark on his website, he had no Trademark when I purchased the domain names yet seems to have convinced WIPO that he is the rightful owner and has stolen several domain names from myself and Defendant Eliot Bernstein of iViewit Technologies.

Marc Randazza had no lawful Trademark on the name Marc Randazza at the time Blogger Crystal Cox purchased Domain Names, nor at the Time iViewit Technology Eliot Bernstein received Domain Names in Receivership.

Attorney / Counter Defendant Ronald D. Green commits Fraud on this Court again in stating, "Cox's efforts in the Oregon court, including posting a Rule 62 supersedeas bond, have prevented the Obsidian plaintiffs from executing their judgment pending Cox's appeal – ensuring that the \$2.5 million judgment has no effect on her finances. Case No. 3:11-cv-57 (ECF 142, 152, 153) (D. Ore. 2012-2013)." This is FALSE and Fraudulent information, as the Court Records, and the Motions to Stay in Obsidian V. Cox CLEARLY Say, what is "stayed", what the "supersedeas bond" is in regard to, and only to is my asset of "My Right to Appeal", which Plaintiff Marc Randazza, and Counter Defendant Daniel Stanton, Marshall Ross and David S. Aman tried to sell at a Sheriff's Sale in Portland Oregon in January 2013. This, "supersedeas bond" has nothing to do with my assets, or seizing any income or assets, as the motion to Stay, as seen in Exhibits and the Judge Granting the Motion Clearly Says. (See Exhibit A, Docket Entry 152"

the docket clearly says, "**Notice of Electronic Filing:**

The following transaction was entered on 1/15/2013 at 9:45 AM PST and filed on 1/15/2013

Case Name:	Obsidian Finance Group, LLC et al v. Cox
Case Number:	3:11-cv-00057-HZ
Filer:	
WARNING: CASE CLOSED on 12/08/2011	
Document Number:	152(No document attached)

Docket Text:

MINUTES of Proceedings: Motion Hearing Held regarding Motion for Stay and Temporary Restraining Order [144]. Judge Marco A. Hernandez presiding.

ORDER: Under Rule 62(d), the stay is GRANTED as to the appeal rights.

Defendant is to post a \$100 bond. David S. Aman present as counsel for plaintiff(s). Benjamin N. Souede and Eugene Volokh present as counsel for defendant(s). Court Reporter: Bonita Shumway. (mr)"

This was in regard to my Right to appeal and NO Other Assets, Income or Rights.

I have NOT abused Electronic Privilege, Attorney / Counter Defendant Ronald D. Green attempts to silence me at every corner. And even if I am denied the right to Electronic Service, I will then Mail my In Forma Paupus. Attorney / Counter Defendant Ronald D. Green is making outrageous and unsubstantiated claims. Attorney / Counter Defendant Ronald D. Green and Plaintiff / Counter Defendant Marc Randazza, Sean Tompkins, Ari Bass who is Michael Whiteacre, and more have threatened me, and my Insider sources. They are dangerous and will stop at nothing to silence those who blow the whistle on them.

See Exhibit E and F.

Income Statement (See Exhibit G for my Sworn Statement of Income, Asset and Expense), and Exhibit D as to my \$2.5 Million Dollar Judgement Recorded.

I have No Assets, I own around 100 domain names, of which are in relation to my online business. I own a 1991 Truck that is smashed up, and other than that, clothes, a bed and a few bookcases, that is all the assets I have.

Exhibit D Shows \$2.5 Million Judgement Against me, filed in Jefferson County where I live, thereby making it impossible to get any local income, without it being attached by the Debtors.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox make a living from my Blogs. My Blogs attract customers and distributors and is my online marketing / blogs are my sole source of income. Of which I must maintain these blogs, as well as a home internet service, and a cell phone service with internet mobile, in order to ensure my income stays stable. I am an MLM distributor for an Online Nutritional MLM Supplement Company.

My cell phone service is \$250 a month, my Internet is \$100 a month for my rural home service. My Electric Bill is \$450, my insurance \$50 a months, my rent is \$825, and other monthly debt per attached G, **my Sworn Statement of Income, Asset and Expenses.**

Plaintiff Marc J. Randazza and Attorney / Counter Defendant Ronald D. Green claim that Apple, National Public Radio, and Proskauer Rose LLP are unrelated. Yet APPLE is using domain names to suppress information to, and APPLE is in negotiations of possible settlement with Eliot Bernstein, as far as I know. Proskauer Rose was the original patent attorneys who stole the technology, and they filed with WIPO to seize domains as well, and asked for Co-Conspirator Peter L. Michaelson, Plaintiff is connecte to them all. Also Plaintiff Marc Randazza has went on National Public Radio and accused me, Defendant / Counter Plaintiff Crystal Cox of falsehoods, extortion, and unspeakable acts, and in conspiracy with NPR host Bob Garfield.

And it is not out of line to ask for the Marshall to serve Judge Gloria Navarro, as I believe, to the best of my knowledge that Judge Gloria Navarro is acting in criminal and civil conspiracy to deny my rights, harass me, threaten me, steal intellectual property and strip me of my right to due process and constitutional rights, and has done the same to Defendant Eliot Bernstein, founder of iViewit Technology.

It is ridiculously out of line, and NOT a matter of law for Plaintiffs' to file a Motion to Strike my counterclaims and my complaint answer. They simply keep smacking me down. It is a fraud on the court and an abuse of their power as attorneys.

Plaintiff Marc J. Randazza and Attorney / Counter Defendant Ronald D. Green Says, "Furthermore, based on Cox's filings, it is clear that she is using her submissions to the Court in the same manner as her websites: Making wild allegations that will stop only when she has received a suitable payment – within this context, settlements from well-heeled companies such as Apple, Intel, and others." This is flatly FALSE and Defamatory.

Plaintiff Marc J. Randazza and Attorney / Counter Defendant Ronald D. Green SUED Me. They used their Internet Mobbing gang of attorney bloggers to create legal commentary on this case, before they served me. They used the court docket as their personal way to disgrace me, humiliated me and Defendant Eliot Bernstein and to harass me. They did this before I had a chance to defend myself. And on top of that, they have deleted massive blogs, stolen domain names and violated my rights, all without due process or first amendment adjudication. Then they threaten to come to my town, they taunt me, intimidate me and put me under constant duress, along with my sources and then claim to this court that, in my fighting back, I am, somehow using the court docket to defame them. I have never told anyone EVER that I would stop posting anything if they paid me. This is a flat out lie to this court, and further abuse of the courts to intimidate an investigative blogger exposing them, reporting on them and to wipe out search engine competition.

The Same Counter Defendants / Co-Conspirators of this case are also involved in RICO, in Pattern and History for this Same Interneting Mobbing in Rakofsky v. The Internet Supreme Court of the State of New York; County of New York, Case Number 105573-2011.

Plaintiff Marc J. Randazza and Attorney / Counter Defendant Ronald D. Green Keeps quoting this statement, "I recommend that everyone go pro se and lawyer up for the appeal, this way you get to introduce more elements into the case and others pick up the case and whatever you right [sic] in your motions to the court is then under 'Absolute Privilege' as a matter of law and can't be considered defamation." This is what Judge Marco Hernandez said in his Denial of my Counter Complaint in Obsidian V. Cox, he said, that what the Attorneys claimed, was not subject to defamation and he gave Absolute Privilege as a Reason. This is a matter of law. And I posted that on that forum, to make fun of the judge for saying that.

Plaintiff Marc J. Randazza and Attorney / Counter Defendant Ronald D. Green continues to use commentary, parody, blogs, and opinions of journalists and reporters, attorneys as fact, documentation and “legal commentary”, evidence somehow, when clearly it is simply First Amendment protected speech made by the “Speaker” in a comment on a blog forum.

There is nothing illegal in my buying AriBass.com to defend my life, Ari Bass, Michael Whiteacre and Sean Tompkins in connection with Randazza Legal Group Attorney J. Malcom DeVoy, are a Public Threat. (See Exhibit E and F) They constantly threaten me and my sources, beat a woman last weekend and are set to be running an illegal prostitution ring. Spending \$10 to fight for my life, is NOT a direct relation to my ability to serve dozens of counter defendants in a lawsuit with 100's of Millions.

MarkVena.com, same thing, he is alleged to be part of the illegal prostitution ring some how. And yes I just spend \$10 on JosephRakofsky.com, to expose their Pattern and History and defend Joseph Rakofsky from this Internet Mobbing attorney ring that is attacking him and me in the same manner.

Plaintiff Marc J. Randazza and Attorney / Counter Defendant Ronald D. Green Again, on page 4 States this Fraud on the Courts, “Cox posted a supersedeas bond in the Obsidian Finance litigation during 2013 as well. Obsidian, Case No. 3:11-cv-57 (ECF 153) (D. Ore. 2013).” This is NOT True in any way. This, as the record clearly shows, is in regard to my Right to Appeal, in which Co-Conspirators tried to steal, and my Attorney Eugene Volokh stopped them. I am still Pro Se in the matter of my assets, and the Debtors rights to seize my income and assets. The “supersedeas bond in the Obsidian Finance litigation during 2013” had nothing to do with this. Plaintiff Marc J. Randazza and Attorney / Counter Defendant Ronald D. Green SHOULD know better. They are both attorneys and know they are LYING deliberately to this court to try and further RUIN me, defame me, attack me, harass me and intimidate me.

Plaintiff Marc J. Randazza and Attorney / Counter Defendant Ronald D. Green LIES to this court and Says, “She can pay for her own litigation, but does not wish to do so. Rather than fund her Counterclaim, Cox prefers to devote her resources to buying domain names that wholly incorporate individuals’ full names in order to harass an ever-expanding universe of unrelated people.” The domains are \$10, the mass blogs are my online business, and they are free blogs as Plaintiff Marc J. Randazza and Attorney / Counter Defendant Ronald D. Green clearly knows yet deliberately, fraudulently lies about. I cannot afford to pay for my own litigation, the only way I have to fight back is by blog, period. They knew that, that is the reason they sued me. I have no money to defend myself in this Obvious Nevada SLAPP Suit, meant to ruin my live and seek Revenge / Whistle Blower Retaliation against me for reporting on them.

Defendant Crystal Cox Declaration of Connected Cases:

Case 2:12-cv-02040-GMN-PA District of Nevada is connected to Case CV-11-57-HZ U.S. District Court District of Oregon, Case 2:12-mc-00017-JPH Eastern District of Washington Circuit Court of Oregon Multnomah County Case No. 121215329 and Ninth Circuit Appeal Case: 12-35319. All case dockets, documents, and filings.

Respectfully Submitted by
Pro Se Defendant / Counter Plaintiff Crystal L. Cox

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system **On February 7th 2013** and a copy emailed Randazza Legal Group at eMail rdg@randazza.com and lmr@randazza.com

Respectfully Submitted
Pro Se Defendant
Crystal L. Cox
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